

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re:  <b>Matthew J Howard</b> <b>Michelle R Howard</b> Debtor(s)  <b>Matthew J Howard</b> <b>Michelle R Howard</b> Movant, v. <b>WELLS FARGO BANK, N.A.,</b> Respondents.	Bankruptcy <b>23-13013-djb</b> Chapter <b>13</b>  Related to Doc. No. <b>83</b>  Hearing: May 15, 2025 at 11:00 AM
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**LIMITED RESPONSE TO MOTION TO APPROVE SALE OF REAL PROPERTY**

WELLS FARGO BANK, N.A. ("Secured Creditor"), by and through its undersigned attorney, hereby files its Limited Response Motion to Approve Sale of Real Property ("Motion") (DE#83) and in support thereof states as follows:

1. Secured Creditor holds a first lien on the subject property located at 3124 Victoria Ct Bensalem, PA 19020 (the "Property").

2. This Court has exclusive jurisdiction over the property in question under 28 USC Section 1334.

3. On April 15, 2025, Matthew J Howard and Michelle R Howard ("Debtors") filed a Motion to Approve Sale of Real for a total sale price of \$375,000.00.

4. Upon review of internal records, the estimated payoff of Secured Creditor's lien as of April 17, 2025 is \$154,230.71. Please contact WELLS FARGO BANK, N.A. the servicer at Phone: 800-274-7025 for an updated payoff at or near the scheduled closing of the sale.

5. Secured Creditor does not object to the Debtor's Motion to the extent that any sale is subject to Secured Creditor's lien and that Secured Creditor's lien will be paid in full at the closing based upon an up to date payoff quote.

6. Secured Creditor is filing the within Limited Response in an abundance of caution, as Secured Creditor wants it to be clear that it should not be compelled to participate in a sale of the property absent payment in full of Secured Creditor's mortgage lien on the real property without being given the right to credit bid pursuant to 11 U.S.C. § 363(k).

7. Furthermore, Secured Creditor requests that failure to complete any sale within 90-days of entry of this Order will result in any Order authorizing the sale to be deemed moot.

**WHEREFORE**, Secured Creditor respectfully requests the Motion be conditionally granted, and any order granting the Motion shall include the terms identified herein; and for such other and further relief as the Court deems just and proper.

Dated: April 23, 2025

**Robertson, Anschutz, Schneid,  
Crane & Partners, PLLC**  
Attorney for Secured Creditor  
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Fairfield, NJ 07004  
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**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that I served the above captioned pleadings at the addresses specified below on April 23, 2025

The types of service made on the parties were:

By First-Class Mail:

**Matthew J Howard**  
3124 Victoria Ct  
Bensalem, PA 19020

900 Market Street Suite 320  
Philadelphia, PA 19107

**Michelle R Howard**  
3124 Victoria Ct  
Bensalem, PA 19020

**BRAD J. SADEK**  
Sadek Law Offices, LLC  
1500 JFK Boulevard Ste 220  
Philadelphia, PA 19102

**KENNETH E. WEST**  
Office of the Chapter 13 Standing Trustee  
190 N. Independence Mall West Suite 701  
Philadelphia, PA 19106

**United States Trustee**  
Office of United States Trustee  
Robert N.C. Nix Federal Building

**Robertson, Anschutz, Schneid,  
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By: /s/ Robert Shearer

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